

Judith A. Lockhart  
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Fax No. 212-732-3232  
lockhart@clm.com

*Attorneys for Defendant St. Jude Medical Export GmbH*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
THE REPUBLIC OF IRAQ, including as :  
PARENS PATRIAE on behalf of the :  
CITIZENS of the REPUBLIC OF IRAQ, :

Plaintiffs, :

- against - :

ABB AG ET AL., and JOHN DOES 1-10, :

Defendants. :  
-----X

08-CV-05951 (SHS)  
ECF Case

**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

2008 JUN 29 PM 12:50  
S.D. OF N.Y.

1. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Judith A. Lockhart, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant's Name: James W. A. Ladner  
Firm Name: St. Jude Medical, Inc.  
Address: One St. Jude Medical Drive  
City/State/Zip: St. Paul, Minnesota 55117  
Phone Number: (651) 756-2048  
Fax Number: (651) 756-2156

2. James W. A. Ladner is a member in good standing of the Bar of the State of Minnesota.

3. There are no pending disciplinary proceeding against James W. A. Ladner in any State or Federal court.

Dated: New York, New York  
June 29, 2011

Respectfully submitted,

By: 

Judith A. Lockhart  
SDNY Bar No.: JL2687  
CARTER LEDYARD & MILBURN LLP  
Two Wall Street  
New York, New York 10005  
Tel. No. 212-732-3200  
Fax No. 212-732-3232  
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*Attorneys for Defendant St. Jude Medical Export GmbH*

Judith A. Lockhart  
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*Attorneys for Defendant St. Jude Medical Export GmbH*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                    |   |                                    |
|------------------------------------|---|------------------------------------|
| -----X                             |   |                                    |
| THE REPUBLIC OF IRAQ, including as | : | Case No. 08-CV-05951 (SHS)         |
| PARENS PATRIAE on behalf of the    | : | ECF Case                           |
| CITIZENS of the REPUBLIC OF IRAQ,  | : |                                    |
|                                    | : |                                    |
| Plaintiffs,                        | : |                                    |
|                                    | : | <b>AFFIDAVIT OF JUDITH A.</b>      |
| - against -                        | : | <b>LOCKHART IN SUPPORT</b>         |
|                                    | : | <b>OF MOTION TO ADMIT</b>          |
| ABB AG ET AL., and JOHN DOES 1-10, | : | <b><u>COUNSEL PRO HAC VICE</u></b> |
|                                    | : |                                    |
| Defendants.                        | : |                                    |
| -----X                             |   |                                    |

STATE OF NEW YORK    )  
                                  ) ss:  
COUNTY OF NEW YORK)

Judith A. Lockhart, being duly sworn, deposes and says:

1. I am a Partner at the law firm of Carter Ledyard & Milburn, LLP, counsel for Defendant, St. Jude Medical Export GmbH, in the above captioned action. I am familiar with the proceedings in this case and make this statement based on my personal knowledge of the facts set forth herein and in support of the Motion to Admit Counsel *Pro Hac Vice* to represent the Defendant in this action.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1986. I am also admitted to the bar of the United States District

Court for the Southern District of New York, and am in good standing with this Court.

3. I have known James W. A. Ladner since June 2011.

4. Mr. Ladner is Deputy General Counsel – Litigation of St. Jude Medical, Inc., in St. Paul, Minnesota. A Certificate of Good Standing for James W. A. Ladner is attached hereto as Exhibit A.

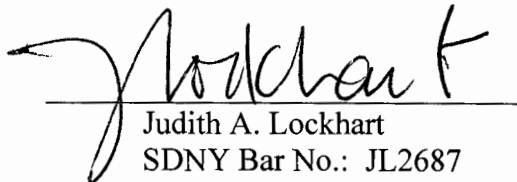
5. Based upon my conversations and meeting with Mr. Ladner I have found him to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of James W. A. Ladner, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of James W. A. Ladner, *pro hac vice*, which is attached hereto as Exhibit B.

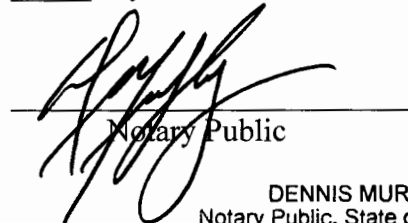
WHEREFORE it is respectfully requested that the Motion to Admit Counsel *Pro Hac Vice*, to represent Defendant in the above captioned matter, be granted.

Respectfully submitted,

  
Judith A. Lockhart  
SDNY Bar No.: JL2687

Sworn to before me this

29<sup>th</sup> day of June, 2011.

  
Notary Public

DENNIS MURPHY  
Notary Public, State of New York  
No. 31-01MU4644752  
Qualified in New York County  
Commission Expires March 30, 2015

# STATE OF MINNESOTA IN SUPREME COURT

## *Certificate of Good Standing*

This is to certify that the following lawyer is in good standing.

JAMES WILLIAM ABBOTT LADNER

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 21, 1983

Given under my hand and seal of this court on

June 17, 2011



*Frederick K. Grittner*

Frederick K. Grittner  
Clerk of Appellate Courts

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                    |                                 |
|------------------------------------|---------------------------------|
| -----X                             |                                 |
| THE REPUBLIC OF IRAQ, including as | : Case No. 08-CV-05951 (SHS)    |
| PARENS PATRIAE on behalf of the    | : ECF Case                      |
| CITIZENS of the REPUBLIC OF IRAQ,  | :                               |
|                                    | :                               |
| Plaintiffs,                        | : <b>ORDER FOR ADMISSION OF</b> |
|                                    | : <b>JAMES W. A. LADNER</b>     |
| - against -                        | : <b><u>PRO HAC VICE</u></b>    |
|                                    | :                               |
| ABB AG ET AL., and JOHN DOES 1-10, | :                               |
|                                    | :                               |
| Defendants.                        | :                               |
| -----X                             |                                 |

Upon the motion of Judith A. Lockhart, attorney for Defendant St. Jude Medical Export GmbH and said sponsor attorney's affidavit in support, it is hereby  
ORDERED that:

|                   |   |
|-------------------|---|
| Applicant's Name: | James W. A. Ladner  |
| Firm Name:        | St. Jude Medical, Inc.                                      |
| Address:          | One St. Jude Medical Drive                                  |
| City/State/Zip:   | St. Paul, Minnesota 55117                                   |
| Phone Number:     | (651) 756 2048  |
| Fax Number:       | (651) 756 2156  |
| Email Address:    | <u><a href="mailto:jladner@sjm.com">jladner@sjm.com</a></u> |

is admitted to practice *pro hac vice* as counsel for Defendant St. Jude Medical Export GmbH, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

---

U.S.D.J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE REPUBLIC OF IRAQ, including as  
PARENS PATRIAE on behalf of the  
CITIZENS of the REPUBLIC OF IRAQ,

Plaintiffs,

- against -

ABB AG ET AL., and JOHN DOES 1-10,

Defendants.  
-----X

: 08-CV-05951 (SHS)  
: ECF Case  
:

**AFFIDAVIT OF MAILING**

STATE OF NEW YORK )

: ss.

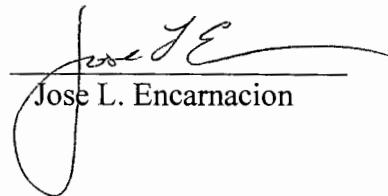
COUNTY OF NEW YORK)

JOSE L. ENCARNACION, being duly sworn, deposes and says that he is over the age of eighteen years and is not a party to this action.

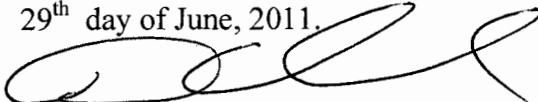
On the 29th day of June, 2011 I served true and correct copies of annexed NOTICE OF APPEARANCE by placing the same in first class post-paid envelopes addressed:

SEE ATTACHED LIST

And on said day I deposited said envelopes with a postal clerk at the United States Post Office located at One Hanover Street, New York, New York, to be dispatched by first class mail.

  
Jose L. Encarnacion

Sworn to before me this  
29<sup>th</sup> day of June, 2011.

  
\_\_\_\_\_  
Notary Public

ANTONIO MALASPINA  
Notary Public, State of New York  
No. 01MA4926741  
Qualified in Kings County  
Certificate Filed in New York County  
Commission Expires April 18, 2014

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UNITED STATES DISTRICT COURT  
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|                                    | : <b>JAMES W. A. LADNER</b>     |
| - against -                        | : <b><u>PRO HAC VICE</u></b>    |
|                                    | :                               |
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Upon the motion of Judith A. Lockhart, attorney for Defendant St. Jude Medical Export GmbH and said sponsor attorney's affidavit in support, it is hereby  
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| Applicant's Name: | James W. A. Ladner                                   |
| Firm Name:        | St. Jude Medical, Inc.                               |
| Address:          | One St. Jude Medical Drive                           |
| City/State/Zip:   | St. Paul, Minnesota 55117                            |
| Phone Number:     | (651) 756 2048                                       |
| Fax Number:       | (651) 756 2156                                       |
| Email Address:    | <a href="mailto:jladner@sjm.com">jladner@sjm.com</a> |

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U.S.D.J.